

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA,

CRIMINAL DIVISION

vs.

Criminal No. 18-46

WILLIAM J. HUGHES,  
Defendant.

Judge David S. Cercone

**MOTION TO REMOVE CONDITION OF  
HOME DETENTION FROM SUPERVISED RELEASE**

AND NOW, comes the Defendant, William J. Hughes, by and through his Attorneys, Jay T. McCamic, Esquire and Douglas Sughrue, Esquire, filing this motion to remove condition of home detention from supervised release. In support thereof, the following is averred:

1. Mr. Hughes was charged, pled guilty to, and was sentenced on a one count indictment with violating:
  - a. Title 18 U.S.C. §371—Conspiracy to violate 42 U.S.C. §1320a-7b(b)(1)(A) from in and around October 2011, to in and around September 2013.
2. On July 13, 2021, Mr. Hughes was sentenced to 60 days in BOP with supervised release to follow, the first year of which Mr. Hughes is to be on home detention.
3. On October 1, 2021, Mr. Hughes reported to FCI-Elkton to serve his BOP sentence.
4. Upon his release at the beginning of December, Mr. Hughes began his 12 months of home detention<sup>1</sup>.
5. During the pretrial stage of this matter, Mr. Hughes's travel restrictions were expanded to include the ability to travel to his daughter's house in Terra Alta, WV, see ECF Docs 76 and 78.

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<sup>1</sup> Home Detention for Mr. Hughes is monitored, but not with an ankle monitor.

6. On December 16, 2021, Mr Hughes filed a motion requesting permission to lift some travel restrictions and to grant the probation office the discretion to grant or deny future travel requests, see ECF Doc. 150. Said motion was not objected to by the USA and was granted on December 17, 2021, see ECF Doc. 151.
7. Mr. Hughes will be on home detention until December 2022. Throughout the next several months, Mr. Hughes will be required to be outside his house tending to the landscaping needs at his house, i.e., mowing grass. Mr. Hughes has concern that the computer will call at a time he is unable to answer the telephone. If Mr. Hughes does not answer the telephone call, Mr. Hughes may mistakenly be deemed outside of home detention.
8. The resources of the USPO are better utilized if dedicated to others who may be a higher risk to reoffend or otherwise violate conditions of SR.
9. USPO Ben Orrison, 412-216-3747, was consulted about this request. PO Orrison mentioned that Mr. Hughes is a low risk offender, has not given probation any problems, and after checking with his superiors has no objection to this request.
10. AUSA Eric Olshan was consulted about this request. On behalf of the USA, Mr. Olshan does object to this request.

WHEREFORE, William J. Hughes, respectfully requests this Honorable Court grant his request to remove the condition of home detention.

Respectfully submitted,

/s/ Jay T. McCamic, Esquire  
Jay T. McCamic

/s/ Douglas Sughrue, Esquire  
Douglas Sughrue, Esquire